

Exhibit B

Joseph G. VanZandt (pro hac vice)
Jennifer Emmel (pro hac vice)
Clinton Richardson (pro hac vice)
BEASLEY ALLEN CROW
METHVIN PORTIS & MILES, P.C.
234 Commerce Street
Montgomery, AL 36103
Tel: 334-269-2343
Email: Joseph.VanZandt@BeasleyAllen.com
Email: Jennifer.Emmel@BeasleyAllen.com
Email: Clinton.Richardson@BeasleyAllen.com

Counsel for Plaintiff

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

LAUREL CLEVENGER,

Plaintiff,

v.

META PLATFORMS, INC., FACEBOOK
HOLDINGS, LLC, FACEBOOK OPERATIONS,
LLC, FACEBOOK PAYMENTS, INC.,
FACEBOOK TECHNOLOGIES, LLC,
INSTAGRAM, LLC, & SICULUS, INC., SNAP,
INC., BYTEDANCE, LTD, BYTEDANCE,
INC., TIKTOK, LTD, TIKTOK, LLC, TIKTOK,
INC.,

Defendants.

Member Case No. 4:22-cv-06457

Case No. 4:22-MD-03047-YGR

MDL No. 3047

DECLARATION OF LAUREL BRYCE CLEVENGER

1. My name is Laurel Bryce Clevenger. I am the Plaintiff in the above-styled matter. I am over the age of 18 and am competent to testify. I have personal knowledge of the matters contained in this Declaration and, if called upon as a witness, could and would competently testify thereto.

2. I retained Beasley, Allen, Crow, Methvin, Portis & Miles, P.C. (“Beasley Allen”) on or about March 29, 2022, to represent me regarding injuries suffered because of social media addiction.

3. From on or about April 25, 2022 to present, I have received regular written reminders from Beasley Allen about my duty to preserve ESI.

4. I understand that counsel from Beasley Allen investigated, prepared, and filed the above-style case on my behalf on August 4, 2022.

5. I understand that, by providing the information below, I am authorizing a limited waiver of the attorney-client privilege, said limitation expressly extending only to the information provided directly to me by my counsel concerning the preservation and imaging of my Apple iPhone 13 5GB, Serial #: VRH4D42X9R (“iPhone 13”) as discussed in this declaration. I do not authorize a general waiver of the attorney-client privilege that exists between me and my attorneys.

6. Between August 10–16, 2022, I read, signed, and returned the acknowledgement of my duty to preserve ESI.

7. On or about August 29, 2022, I met with one of my attorneys, Suzanne Clark, to discuss the preservation and identification of Electronically Stored Information (“ESI”) relating to my accounts and devices.

8. On May 6, 2024, I attended a Zoom Meeting with Minely Estrada, a forensic examiner, for the collection of my ESI available through cloud accounts.

9. On May 13, 2024, I met in person with Duc Nguyen, a forensic examiner, at Courtyard, 4100 Presidential Blvd, Philadelphia, PA 19131, for the collection of my iPhone 13 and HP Pavilion x360 Convertible 14-dh2xxx 5 GB, Serial #: 8CGO353Z7B (“Laptop”).

10. On August 6, 2024, Beasley Allen paralegal Maida Skaljic-Nur contacted me about replacing my iPhone 13 for preservation purposes.

11. Maida Skaljic-Nur told me that Beasley Allen would replace the iPhone 13 with a new iPhone and would help me transfer my data from the iPhone 13 to the replacement iPhone.

12. Maida Skaljic-Nur told me that I would keep the replacement iPhone and ship the iPhone 13 to the forensic examiner, CFS.

13. Maida Skaljic-Nur told me that CFS would image the iPhone 13 in their lab and keep it as evidence.

14. On August 7, 2024, I received the replacement iPhone, an Apple iPhone 15 Pro, Serial #: MMWDQCL6JC (“iPhone 15 Pro”).

15. On August 7, 2024, I set up the iPhone 15 Pro and moved everything over from the iPhone 13 according to the on-screen options.

16. After transferring all the information from the iPhone 13 to the iPhone 15 Pro, on August 8, 2024, I took the iPhone 13 and Laptop to the Fed Ex Store and shipped it to CFS.

17. On August 14, 2024, I met with my attorneys, Clinton Richardson and Suzanne Clark, and first learned that I accidentally initiated a factory reset of the iPhone 13 during the process of copying the contents of the iPhone 13 to the iPhone 15 Pro on August 7, 2024.

18. On August 16, 2024, I met in person with Joseph Lanterman, a forensic examiner, at DoubleTree by Hilton Hotel Sonoma Wine Country, One Doubletree, Rohnert Park, CA 94928, for the collection of the iPhone 15.

I declare, under penalty of perjury under the laws of the State of California, and pursuant to 28 U.S.C. § 1746, that the above statements are true and correct to the best of my knowledge, information, and belief.

This the ¹⁹ day of August, 2024.



Laurel Clevenger
Plaintiff


SIGNATURE CERTIFICATE



REFERENCE NUMBER
09FBB46B-9DF4-4C3E-A91C-C76FFF0730BB

TRANSACTION DETAILS	DOCUMENT DETAILS
Reference Number 09FBB46B-9DF4-4C3E-A91C-C76FFF0730BB	Document Name Client Affidavit - Clevenger 2024-08-17 - clean copy
Transaction Type Signature Request	Filename Client_Affidavit_-_Clevenger_2024-08-17_-_clean_copy.docx
Sent At 08/19/2024 08:50 EDT	Pages 4 pages
Executed At 08/19/2024 09:12 EDT	Content Type application/vnd.openxmlformats-officedocument.wordprocessingml.document
Identity Method email	File Size 28.3 KB
Distribution Method email	Original Checksum a7ce637d8e15d3e68b026874cb59be8f84d17b5951b879d854d8e2ae09d34ab5
Signed Checksum de448b034b8b8d3139c9d461b839c34d80259311291cc8c279a1478c2a47c738	
Signer Sequencing Disabled	
Document Passcode Disabled	

SIGNERS

SIGNER	E-SIGNATURE	EVENTS
Name Laurel Clevenger	Status signed	Viewed At 08/19/2024 09:10 EDT
Email laurelclevenger@gmail.com	Multi-factor Digital Fingerprint Checksum 35615e5799aac161e1041e2a1f7281277aeb659acde6b5328a96b29ac16e31e3	Identity Authenticated At 08/19/2024 09:12 EDT
Components 3	IP Address 24.6.20.132	Signed At 08/19/2024 09:12 EDT
	Device Mobile Safari via iOS	
	Drawn Signature 	
	Signature Reference ID CBE57A95	
	Signature Biometric Count 1	

AUDITS

TIMESTAMP	AUDIT
08/19/2024 08:50 EDT	Angela Byrum (angela.byrum@beasleyallen.com) created document 'Client_Affidavit_-_Clevenger_2024-08-17_-_clean_copy.docx' on Chrome via Windows from 4.38.61.2.
08/19/2024 08:50 EDT	Laurel Clevenger (laurelclevenger@gmail.com) was emailed a link to sign.
08/19/2024 09:10 EDT	Laurel Clevenger (laurelclevenger@gmail.com) viewed the document on Mobile Safari via iOS from 24.6.20.132.
08/19/2024 09:12 EDT	Laurel Clevenger (laurelclevenger@gmail.com) authenticated via email on Mobile Safari via iOS from 24.6.20.132.
08/19/2024 09:12 EDT	Laurel Clevenger (laurelclevenger@gmail.com) signed the document on Mobile Safari via iOS from 24.6.20.132.